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1522-CC00974 - ANTHONY L JACKSON V TRACY ROBERTSON ET AL (E-CASE)

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Display Options:

08/03/2015	<input type="checkbox"/>	<a href="#">Corporation Served</a>
		Document ID - 15-SMCC-16009; Served To - LIFE INSURANCE COMPANY OF NORTH AMERICA; Server - ; Served Date - 20-JUL-15; Served Time - 00:00:00; Service Type - Other; Reason Description - Served
07/21/2015	<input type="checkbox"/>	<a href="#">Request Filed</a>
		Request to Continue.
		Filed By: ALLEN H SURINSKY
		On Behalf Of: ANTHONY L JACKSON
07/20/2015	<input type="checkbox"/>	<a href="#">Request Filed</a>
		Request to Continue.
		Filed By: ALLEN H SURINSKY
		On Behalf Of: ANTHONY L JACKSON
07/13/2015	<input type="checkbox"/>	<a href="#">Summons Issued-Circuit</a>
		Document ID: 15-SMCC-16009, for LIFE INSURANCE COMPANY OF NORTH AMERICA.
07/02/2015	<input type="checkbox"/>	<a href="#">Proposed Order Filed</a>
		Default and Inquiry; Notice.
		Filed By: ALLEN H SURINSKY
		On Behalf Of: ANTHONY L JACKSON
	<input type="checkbox"/>	<a href="#">Request for Alias Summons</a>
		Filed By: ALLEN H SURINSKY
	<input type="checkbox"/>	<a href="#">Amended Motion/Petition Filed</a>
		First Amended Petition for Benefits; Request for Alias Summons.
		Filed By: ALLEN H SURINSKY
		On Behalf Of: ANTHONY L JACKSON
05/21/2015	<input type="checkbox"/>	<a href="#">Agent Served</a>
		Document ID - 15-SMCC-4415; Served To - CIGNA; Server - ; Served Date - 21-MAY-15; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served
05/14/2015	<input type="checkbox"/>	<a href="#">Summons Personally Served</a>
		Document ID - 15-SMCC-4414; Served To - ROBERTSON, TRACY; Server - R PHILLIPS, SERVICE DEPUTY; Served Date - 14-MAY-15; Served Time - 09:49:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - SERVED @ 7600 HALL ST
05/13/2015	<input type="checkbox"/>	<a href="#">Jury Trial Scheduled</a>
		Scheduled For: 11/30/2015; 9:00 AM ; BRYAN L HETTENBACH; City of St. Louis
05/05/2015	<input type="checkbox"/>	<a href="#">Summons Issued-Circuit</a>
		Document ID: 15-SMCC-4415, for CIGNA.

EXHIBIT  
A

<input type="checkbox"/>	<a href="#">Summons Issued-Circuit</a>
	Document ID: 15-SMCC-4414, for ROBERTSON, TRACY.
<input type="checkbox"/>	<b>Filing Info Sheet eFiling</b>
	<b>Filed By:</b> ALLEN H SURINSKY
<input type="checkbox"/>	<b>Note to Clerk eFiling</b>
	<b>Filed By:</b> ALLEN H SURINSKY
<input type="checkbox"/>	<a href="#">Pet Filed in Circuit Ct</a>
	Petition 5-4-15.
	<b>Filed By:</b> ALLEN H SURINSKY
	<b>On Behalf Of:</b> ANTHONY L JACKSON
<input type="checkbox"/>	<b>Judge Assigned</b>

1522-CC00974

Electronically Filed - City of St. Louis - May 05, 2015 - 11:17 AM

STATE OF MISSOURI                     )  
  ) SS.  
CITY OF ST. LOUIS                    )

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

ANTHONY JACKSON,                     )  
  )  
                          Plaintiff,                     )  
  ) Cause No.:  
vs.   )  
  ) Division  
TRACY ROBERTSON,                     )  
Serve: City Justice Center             )  
      200 S. Tucker                     )  
      St. Louis, MO 63102             )  
  )  
and   )  
  )  
CIGNA - Life and Accident Claims     )  
Serve: John M. Huff, Director         )  
      Department of Insurance,         )  
      Financial Institutions             )  
      & Professional Registration       )  
      Truman State Office Building     )  
      Room 530                         )  
      301 West High Street             )  
      Jefferson City, MO 65101         )  
  )  
                          Defendants.             )

**PETITION FOR BENEFITS**

Comes now the Plaintiff, by his attorney, and for his Petition for Benefits, states as follows:

1. Plaintiff Anthony Jackson is an individual citizen and resident of the State of Missouri and the only heir of Lee Otis Jackson, deceased.
2. Defendant Tracy Robertson is an individual citizen and resident of the State of Missouri currently residing in the St. Louis City Jail.
3. That Lee Otis Jackson, now deceased, has a life insurance policy from CIGNA through Federal Express, his place of work, and made Defendant beneficiary of said policy.

4. That Defendant did, in fact, willfully and unlawfully stab Lee Otis Jackson in the neck on June 21, 2014 causing his death in the City of St. Louis.

5. That said Defendant is now being held for trial in the death of Lee Otis Jackson and is liable for his death.

6. That Defendant is responsible for the death of Lee Otis Jackson and should not be awarded the benefits from his life insurance policy and is disqualified from receiving the death benefits.

7. That Plaintiff is entitled to the insurance proceeds in the event Tracy Robertson is disqualified herewith.

8. That Plaintiff made a claim for the insurance benefit.

9. That Plaintiff has been denied payment of the insurance benefit due to the fact that Defendant Robertson is listed as the beneficiary of the policy .

10. That Lee Otis Jackson died as a result of being stabbed, willfully and unlawfully, in the neck by the Defendant eliminating her as a possible beneficiary of the policy and is charged criminally with causing his death.

11. That the deceased (insured) had no spouse.

12. That the policy provides that if the beneficiary is disqualified for any reason then any potential death benefits will be paid to the first surviving of the following living relatives: spouse, child or children, mother or father, brothers or sisters.

13. Since there is no spouse and there is only one child, the Plaintiff, Anthony Jackson, he is entitled to the proceeds.

WHEREFORE, Plaintiff Anthony Jackson respectfully requests that this Court find in his favor and find Defendant is disqualified from receiving the death benefit, and award Plaintiff the amount of benefits Defendant would have received from Lee Otis Jackson's life

insurance with his employer, interest, attorney's fees, expenses and costs, and such further and additional relief as the Court deems appropriate and consistent with the interests of justice in excess of \$25,000.00 and that said death benefit be awarded to the son of the deceased, Anthony Jackson, as there are no other heirs of the deceased.

Respectfully submitted,

/s/ ALLEN H. SURINSKY

ALLEN H. SURINSKY - #15457

225 South Meramec, Suite 401

Clayton, Missouri 63105

(314) 771-5900 Fax: (314) 721-5046

Attorney for Plaintiff



## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1522-CC00974
Plaintiff/Petitioner: ANTHONY L JACKSON	Plaintiff's/Petitioner's Attorney/Address ALLEN H SURINSKY SUITE 401 225 S. MERAMEC AVE. CLAYTON, MO 631053511
vs.	
Defendant/Respondent: TRACY ROBERTSON	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: TRACY ROBERTSON  
Alias: TRACY JEANNE ROBERTSON

200 SOUTH TUCKER  
CITY JUSTICE CENTER  
ST. LOUIS, MO 63102

SHERIFF'S FEE PAID

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

MAY 5, 2015

Date

Thomas Kloeppinger  
Circuit Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name) (title).

☐ other

Served at (address)

in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on (date).

(Seal)

My commission expires:

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$  
 Non Est \$  
 Mileage \$ ( miles @ \$ . per mile)  
 Total \$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1522-CC00974
Plaintiff/Petitioner: ANTHONY L JACKSON	Plaintiff's/Petitioner's Attorney/Address ALLEN H SURINSKY SUITE 401 225 S. MERAMEC AVE. CLAYTON, MO 631053511
Defendant/Respondent: TRACY ROBERTSON	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: CIGNA		Alias: LIFE & ACCIDENT CLAIMS	Cole County Sheriff
301 W. HIGH STREET ROOM 530 JEFFERSON CITY, MO 65101			
 CITY OF ST LOUIS	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p>		
	MAY 5, 2015 Date Thomas Kloeppinger Circuit Clerk		
Further Information:			
<b>Sheriff's or Server's Return</b> <p><b>Note to serving officer:</b> Summons should be returned to the court within thirty days after the date of issue.</p> <p>I certify that I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other _____</p> <p>Served at _____ (address)  in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).</p> <p>_____  Printed Name of Sheriff or Server  _____  Signature of Sheriff or Server</p> <p><b>Must be sworn before a notary public if not served by an authorized officer:</b>  Subscribed and sworn to before me on _____ (date).  My commission expires: _____  _____  Date  _____  Notary Public</p>			
<b>Sheriff's Fees, if applicable</b> Summons \$ _____ Non Est \$ _____ Mileage \$ _____ ( _____ miles @ \$ _____ per mile) Total \$ _____ A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.			





## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

RECEIVED

Judge or Division: BRYAN L HETTENBACH	Case Number: 1522-CC00974
Plaintiff/Petitioner: ANTHONY L JACKSON	Plaintiff's/Petitioner's Attorney/Address ALLEN H SURINSKY SUITE 401 225 S. MERAMEC AVE. CLAYTON, MO 631053511
Defendant/Respondent: TRACY ROBERTSON	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Miscellaneous Actions	

MAY 11 2015

COLE COUNTY  
SHERIFF'S OFFICE  
RECEIVED

MAY 20 2015

COLE COUNTY  
SHERIFF'S OFFICE  
(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: CIGNA

*John M. Huff, Director* Alias: LIFE & ACCIDENT CLAIMS  
301 W. HIGH STREET  
ROOM 530  
JEFFERSON CITY, MO 65101

Cole County Sheriff

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

MAY 5, 2015

*Thomas Kloeppinger*

Date

Thomas Kloeppinger  
Circuit Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

*Km Conder* (name) *Rayen* (title).

☐ other \_\_\_\_\_

Served at *301 W High* (address)  
in *Cite* (County/City of St. Louis), MO, on *5/21/15* (date) at *441* (time).

*g. h. h. h.*  
Printed Name of Sheriff or Server

*B. J. h. h. h. h.*  
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

*200.00*  
*200.00*  
*200.00*





**JAMES W. MURPHY**  
**SHERIFF**  
CITY OF ST. LOUIS  
CIVIL COURTS BUILDING  
10 NORTH TUCKER BOULEVARD  
ST. LOUIS, MISSOURI 63101  
622-4851

D-1

**Return of Service on Summons / Subpoena**

Doc. ID Number 15-SMCL-4414

Case Number 1522-CC 00974

I hereby certify that I served the within summons:

By delivering on the 14 day of MAY, 20 15, at approximately 9:49 am pm, a copy of the petition to each of the within – named defendants:

Tray Robertson  
Defendant

7600 8. ~~Federal~~ Hall St  
Address

All done in the City of St. Louis, Missouri

Executed:

☒ Summons

☐ Subpoena

Personal: X

Copy/Relationship: \_\_\_\_\_

On Behalf of: \_\_\_\_\_

Posted: \_\_\_\_\_

Non-Est Reason: \_\_\_\_\_

Fee: 36

James W. Murphy  
Sheriff of the City of St. Louis

By Rim Phillips <sup>2/3</sup>

Deputy




## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1522-CC00974
Plaintiff/Petitioner: ANTHONY L JACKSON	Plaintiff's/Petitioner's Attorney/Address ALLEN H SURINSKY SUITE 401 225 S. MERAMEC AVE. CLAYTON, MO 631053511
Defendant/Respondent: TRACY ROBERTSON	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Miscellaneous Actions	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: TRACY ROBERTSON Alias: TRACY JEANNE ROBERTSON 200 SOUTH TUCKER CITY JUSTICE CENTER ST. LOUIS, MO 63102	<div style="border: 1px solid black; padding: 5px; text-align: center;">SHERIFF'S FEE PAID</div>
	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">MAY 5, 2015</p> <p style="text-align: center;">Date</p> <p style="text-align: center;">Further Information:</p>
	<p style="text-align: center;">Thomas Kloeppinger Circuit Clerk</p>

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server \_\_\_\_\_ Signature of Sheriff or Server \_\_\_\_\_

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public \_\_\_\_\_

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

STATE OF MISSOURI                    )  
  ) SS.  
CITY OF ST. LOUIS                    )

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

ANTHONY JACKSON,                    )  
  )  
                  Plaintiff,                    )  
  ) Cause No.: 1522-CC00974  
vs.    )  
  ) Division 1  
TRACY ROBERTSON and                )  
LIFE INSURANCE COMPANY OF        )  
NORTH AMERICA                        )  
  )  
                  Defendants.                )

**FIRST AMENDED PETITION FOR BENEFITS**

**COUNT I**

Comes now plaintiff and for Count I of his petition against Defendant Tracy Robertson, states as follows:

1. Plaintiff Anthony Jackson is an individual citizen and resident of the State of Missouri and the only heir of Lee Otis Jackson, deceased.

2. Defendant Tracy Robertson is an individual citizen and a resident of the State of Missouri currently residing in the St. Louis City Jail.

3. That Lee Otis Jackson, now deceased, had a life insurance policy from CIGNA (Life Insurance Company of North America) through Federal Express, his place of employment, and made Defendant Robertson beneficiary of said policy.

4. That Defendant Robertson did, in fact, willfully and unlawfully stab Lee Otis Jackson and is liable for his death.

5. That Defendant Robertson is responsible for the death of Lee Otis Jackson and should

not be awarded the benefits from his life insurance policy and is disqualified from receiving the death benefits pursuant to §561.054(2) RSMo, which states, "A beneficiary who willfully and unlawfully causes or participates with another in causing the death of the owner, or the insured individual under a life insurance policy or certificate, is disqualified from receiving any benefit of a nonprobate transfer from the owner or any proceeds payable as a result of the death of an individual insured under a life insurance policy or certificate. The beneficiary designation shall be given effect as if the disqualified beneficiary had disclaimed it."

WHEREFORE, plaintiff prays for judgment under Count I of this petition in his favor and against Defendant Robertson, and further, that the Court find that Defendant Robertson is disqualified from receiving any death benefits arising from the death of Lee Otis Jackson, through the decedent's employer or any other source, and shall be considered as though Defendant Robertson had disclaimed it; for interest, attorney's fees, expenses and costs, and such other and further relief as the Court deems appropriate and consistent with the interests of justice in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,00000), and that said death benefit be awarded to plaintiff, the son of the decedent, as there are no other heirs.

## COUNT II

Comes now plaintiff and for Count II of his petition against Defendant Cigna, a/k/a Life Insurance Company of North America (hereinafter "Cigna"), and states to the Court as follows:

6. Plaintiff restates, repleads and incorporates by reference the allegations contained in paragraphs 1 through 5 of Count I of this petition.

7. That plaintiff, as the only son and heir of the decedent, Lee Otis Jackson, is entitled to the insurance proceeds in the event Tracy Robertson is disqualified herewith.

8. That plaintiff made a claim for the insurance benefit.

9. That plaintiff has been denied payment of the insurance benefit due to the fact that Defendant Robertson is listed as the beneficiary of the policy.

10. That the decedent, Lee Otis Jackson, died as a result of being stabbed, willfully and unlawfully, in the neck by the defendant, eliminating her as a possible beneficiary of the policy and she is charged criminally with causing his death.

11. That the deceased (insured) had no spouse.

12. That the policy provides that if the beneficiary is disqualified for any reason then any potential death benefits will be paid to the first surviving of the following living relatives: spouse, child or children, mother or father, brothers or sisters.

13. Since there is no spouse and there is only one child, the plaintiff, Anthony Jackson, he is entitled to the proceeds.

WHEREFORE, Plaintiff Anthony Jackson prays under Count II of his petition that this Court find in his favor and award him the amount of benefits Defendant Robertson would have received from Lee Otis Jackson's life insurance with his employer, plus interest, attorney's fees, expenses and costs, and such further and additional relief as the Court deems appropriate and consistent with the interests of justice in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), and that said death benefit be awarded to the son of the deceased, Anthony Jackson, as there are no other heirs of the deceased.

Respectfully submitted,

/s/ Allen H. Surinsky

ALLEN H. SURINSKY - #15457

225 South Meramec, Suite 401

Clayton, Missouri 63105

(314) 721-5900 Fax: (314) 721-5046

ahsurinsky@sbcglobal.net

Attorney for Plaintiff

STATE OF MISSOURI                     )  
  ) SS.  
CITY OF ST. LOUIS                    )

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

ANTHONY JACKSON,                     )  
  )  
                          Plaintiff,                     )  
  ) Cause No.: 1522-CC00974  
vs.   )  
  ) Division 1  
TRACY ROBERTSON and                 )  
LIFE INSURANCE COMPANY OF         )  
NORTH AMERICA                         )  
  )  
                          Defendants.                 )

**REQUEST FOR ALIAS SUMMONS**

Alias Summons requested to issue to Sheriff of Cole County, 350 East High  
Street, Jefferson City, Missouri 65101.

The new summons to be served on:

Life Insurance Company of North America  
c/o Director, Missouri Division of Insurance  
301 West High Street, Room 530  
Jefferson City, Missouri 65101

/s/ Allen H. Surinsky  
\_\_\_\_\_  
ALLEN H. SURINSKY - #15457  
225 South Meramec, Suite 401  
Clayton, Missouri 63105  
(314) 721-5900      Fax: (314) 721-5046  
[ahsurinsky@sbcglobal.net](mailto:ahsurinsky@sbcglobal.net)  
Attorney for Plaintiff



STATE OF MISSOURI                     )  
  ) SS.  
CITY OF ST. LOUIS                    )

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

ANTHONY JACKSON,                     )  
  )  
                          Plaintiff,                     )  
  ) Cause No.: 1522-CC00974  
vs.   )  
  ) Division 1  
TRACY ROBERTSON and                 )  
LIFE INSURANCE COMPANY OF         )  
NORTH AMERICA                        )  
  )  
                          Defendants.                 )

**DEFAULT AND INQUIRY**

Default and inquiry granted against Defendant Tracy Robertson.

/s/ Allen H. Surinsky

ALLEN H. SURINSKY - #15457  
225 South Meramec, Suite 401  
Clayton, Missouri 63105  
(314) 721-5900       Fax: (314) 721-5046  
[ahsurinsky@sbcglobal.net](mailto:ahsurinsky@sbcglobal.net)  
Attorney for Plaintiff



## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1522-CC00974
Plaintiff/Petitioner: ANTHONY L JACKSON	Plaintiff's/Petitioner's Attorney/Address ALLEN H SURINSKY SUITE 401 225 S. MERAMEC AVE. CLAYTON, MO 631053511
Defendant/Respondent: TRACY ROBERTSON	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: LIFE INSURANCE COMPANY OF NORTH AMERICA

Alias:

DIRECTOR MISSOURI DIVISION OF  
INSURANCE 301 W HIGH ST RM 530  
JEFFERSON CITY, MO 65101

COLE COUNTY, MO

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

JULY 13, 2015

Date

Thomas Kloeppinger  
Circuit Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name) (title).

☐ otherServed at (address)  
in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on (date).

My commission expires:

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$

Non Est \$

Mileage \$ ( miles @ \$ . per mile)

Total \$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

STATE OF MISSOURI     )  
                                      ) SS.  
CITY OF ST. LOUIS     )

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

ANTHONY JACKSON,                     )  
                                      )  
                  Plaintiff,             )  
                                      ) Cause No.: 1522-CC00974  
vs.                                        )  
                                      ) Division 1  
TRACY ROBERTSON, et al.,            )  
                                      )  
                  Defendants.            )

**REQUEST TO CONTINUE**

Comes now plaintiff, by his attorney, and requests that the Statement of Account which was scheduled for July 20, 2015 be continued.

/s/ Allen H. Surinsky  
\_\_\_\_\_  
ALLEN H. SURINSKY - #15457  
225 South Meramec, Suite 401  
Clayton, Missouri 63105  
(314) 721-5900     Fax: (314) 721-5046  
[ahsurinsky@sbcglobal.net](mailto:ahsurinsky@sbcglobal.net)  
Attorney for Plaintiff

Copy of the foregoing sent via the Court's electronic filing system this 20th day of July, 2015, to all attorneys of record.

/s/ Allen H. Surinsky  
\_\_\_\_\_

STATE OF MISSOURI     )  
                                  ) SS.  
CITY OF ST. LOUIS     )

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

ANTHONY JACKSON,                     )  
  )  
                  Plaintiff,                )  
  ) Cause No.: 1522-CC00974  
vs.   )  
  ) Division 1  
TRACY ROBERTSON, et al.,             )  
  )  
                  Defendants.             )

**REQUEST TO CONTINUE**

Comes now plaintiff, by his attorney, and requests that the Default and Inquiry scheduled for July 22, 2015 be continued.

/s/ Allen H. Surinsky  
\_\_\_\_\_  
ALLEN H. SURINSKY - #15457  
225 South Meramec, Suite 401  
Clayton, Missouri 63105  
(314) 721-5900     Fax: (314) 721-5046  
[ahsurinsky@sbcglobal.net](mailto:ahsurinsky@sbcglobal.net)  
Attorney for Plaintiff

Copy of the foregoing sent via the Court's electronic filing system this 21st day of July, 2015, to all attorneys of record.

/s/ Allen H. Surinsky  
\_\_\_\_\_



## IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: BRYAN L HETTENBACH	Case Number: 1522-CC00974	<b>RECEIVED</b> JUL 17 2015 COLE COUNTY SHERIFF'S OFFICE (Date File Stamp)
Plaintiff/Petitioner: ANTHONY L JACKSON	Plaintiff's/Petitioner's Attorney/Address ALLEN H SURINSKY SUITE 401 225 S. MERAMEC AVE. CLAYTON, MO 631053511	
Defendant/Respondent: TRACY ROBERTSON	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC: Other Miscellaneous Actions		

## Summons in Civil Case

The State of Missouri to: LIFE INSURANCE COMPANY OF NORTH AMERICA

Alias:

DIRECTOR MISSOURI DIVISION OF  
INSURANCE 301 W HIGH ST RM 530  
JEFFERSON CITY, MO 65101

COLE COUNTY, MO

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

JULY 13, 2015

Date

Thomas Kloeppinger  
Circuit Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Don Cardeas (name) Reserve (title).

☐ other \_\_\_\_\_ (address)

Served at 301 W High St (County/City of St. Louis), MO, on 7/20/15 (date) at 2:30 PM (time).

g. H. H. Printed Name of Sheriff or Server BY J. H. H. Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.